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10
11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF ARIZONA**

13 The Church of the Eagle and the Condor, *et al.*,

14 Plaintiffs,

15 v.

16 Merrick Garland, *et al.*,

17 Defendants.
18
19

Case No. 2:22-cv-01004-PHX-SRB

**JOINT MOTION FOR ENTRY OF
ORDER GOVERNING THE TAKING
OF REMOTE DEPOSITIONS**

20
21 The Parties jointly move for entry of an order (filed together with this motion) governing
22 the taking of remote depositions in the above captioned matter. Due to the physical location of the
23 deponents, counsel and the court reporters, the taking of in-person depositions in this matter is
24 infeasible. Additionally, due to the COVID-19 pandemic, the parties share a mutual desire to
25 protect the health and safety of the deponents, the court reporters and counsel. Counsel for the
26 parties agree that protocols governing the taking of depositions remotely, including the Platform
27 to be used, the presenting of exhibits, and the financial burden of taking the deposition, will prevent
28 unnecessary conflict during the depositions and between counsel. The parties therefore agree that

1 good cause exists for the depositions to be taken remotely.

2 The parties respectfully request that the Court issue the parties' Proposed Stipulated Order
3 Governing the Taking of Remote Depositions accompanying this Motion.

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5 Respectfully submitted this 3rd day of October, 2023.

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